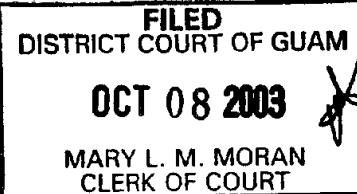


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**Attorneys for Plaintiff**  
**LA-RESA BLAS**

**IN THE UNITED STATES DISTRICT COURT**

**LA-RESA BLAS,**

**CIVIL CASE NO. 03-00027**

**Plaintiff,**

**DISCOVERY PLAN**

**vs.**

**IMPERIAL SUITES, INC.,**  
**d/b/a IMPERIAL SUITES HOTEL**  
**and BONG ROBATO,**

**Defendants.**

**DISCOVERY PLAN**

Pursuant to Rule 26 (f) of the Federal Rules of Civil Procedure and Local Rule 16.2, the parties agree to and hereby submit the following plan:

A. Depositions of fact witnesses may begin at once and be taken as needed, prior to the discovery cutoff date. Some of the parties may call expert witnesses in this case.

B. Unless additional discovery is ordered by the Court, the parties also may propound one set each of interrogatories (25 maximum) and requests for admissions (25 maximum). Requests for production may also be propounded. This discovery shall

**ORIGINAL**

**LaRosa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato**

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**Discovery Plan**

**October 8, 2003**

be served in such a fashion as to be subject to answer or response on or before the discovery cutoff date.

C. The parties, except as otherwise noted, agree to provide all predisclosure and preliminary discovery mandated by Local Rules and FRCP Rule 26 by December 19, 2003. Compliance with mandatory disclosure as is set forth in Rule 26 (a) (1) is on-going.

D. All parties will exchange names and reports (if any) of expert witnesses on or before January 23, 2004.

E. The specific subjects on which discovery may be needed are:

Facts supporting the nature of the claims and defenses.

F. Other than the provisos set forth above in Item B, the parties do not anticipate requiring any other changes or limitations on discovery as imposed under the Federal and Local Rules.

G. The Cutoff date for discovery is April 2, 2004.

**APPROVED AS TO FORM AND CONTENT:**

Dated: October 8, 2003.

GORMAN & GAVRAS

BY:

  
WILLIAM L. GAVRAS, ESQ.  
Attorneys for Plaintiff  
LA-RESA BLAS

LaRosa Blas v. Imperial Suites, Inc, dba Imperial Suites Hotel and Bong Robato  
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October 8, 2003

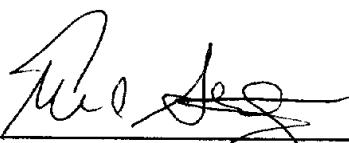
Dated: October 8, 2003

LAW OFFICES OF CULIFFE & COOK, P.C.

BY:   
F. RANDALL CUNLIFFE, ESQ.  
Attorneys for Defendant  
BONG ROBATO

Dated: October 8, 2003

KLEMM, BLAIR, STERLING & JOHNSON

BY:   
THOMAS C. STERLING, ESQ.  
Attorneys for Defendant  
IMPERIAL SUITES, INC, dba IMPERIAL  
SUITES HOTEL